

The diagram features a central horizontal bar with a blue-to-purple gradient. Above the bar, two light blue arrows point to the right. The left arrow is labeled '1990 CAA' and the right arrow is labeled '2007 Target'. Black lines connect these arrows to the central bar and extend downwards to the footer text. The footer text includes 'Wisconsin's Clean Air Task Force' and the date 'November 19, 1999'.

**1990  
CAA**

**2007  
Target**

# **1 Hour Ozone SIP Development**

**Wisconsin's Clean Air Task Force**

**November 19, 1999**

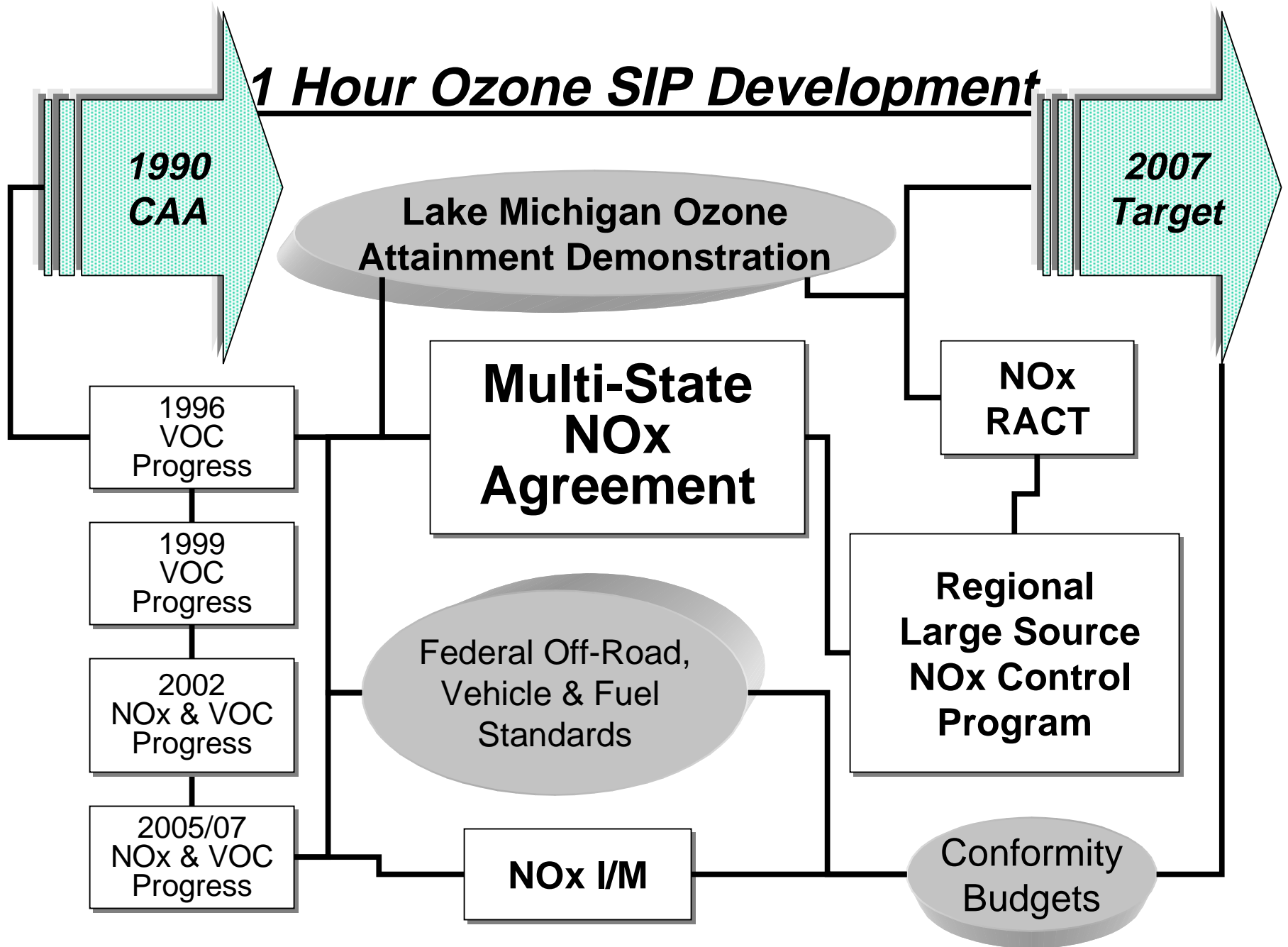
**22 State NOx SIP**

# **Uncertainty Remains**

**8 Hour Standard**

**Post-2000  
NOx Waiver**

# 1 Hour Ozone SIP Development



## **Core Issues: 1 Hr Focus but sensitive to 8 Hr impacts**

- Better Performance in Modeling Large Domain
- Improved Model Inputs for Base & 2007 (Vs OTAG)
- Strategies acknowledging current control commitments
- Formal & Weight-of-Evidence Attainment Tests
- No “Bright-Line” modeling answer on *best* Control Level



### **Lake Michigan Ozone Attainment Demonstration**

***Model Output Target > Mid-January 2000***

# Multi-State NOx Agreement

*Target > February 2000*

## **Core Issues:**

- Balancing Local Vs Transport Controls
- Application of Formal & Weight-of-Evidence  
Culpability Assessments
- Base Projections for Mobile & Utility Sectors
- 1 Hr focus, but sensitive to 8 Hr & Disbenefit also
- Timing & Depth of Control Commitments
- Scope & Strength of Agreement(s)
- Sector/Source Commitments Vs “Budgets”



## **Regional Large Source NOx Control Program**

### ***SIP Planning Focus:***

- Core Rule Structure
- Trading Program Construct
- Possible translation to concurrent RACT and NOx SIP planning efforts

### ***Issues:***

Control Level and Phasing  
for large EGU's

Scope of Non-EGU  
Commitments

Geographic Scope

Complex or Simple Program

Making NOx Trades Possible

Tie-in potential to later  
regional or national  
programs

***Target for Draft Rule > March 2000***

## **NOx RACT**

### ***SIP Planning Focus:***

- Basic requirement w/o Waiver
- Develop Approvable Rule Structure - Who & Where
- Craft program sensitive to both RACT precedents & NOx control need for attainment
- Potential component of ROP for 2002/2005

### ***Program Issues:***

Who Affected  
Control Level and Timing  
Geographic Scope  
Complex or Simple Program  
Regional program Tie-ins....Trading, etc  
Monitoring Requirements

### ***Stakeholder Issues:***

Advisory Input Process  
Waiver circumstance understanding  
Short Planning Timeline  
Legal underpinnings of RACT/ROP  
Certainty & Clarity of Charge

***Target for Draft Rule > March 2000***

# NO<sub>x</sub> RACT/Waiver Schedule

- √ **Nov** - NO<sub>x</sub> RACT Technical Advisory Group Start-up
- **Dec** - Finish initial regional attainment strategy modeling (*for 1-Hour needs but sensitive to 8-Hour Impacts*)
- **Jan/Feb** - Establish regional ozone control strategy and do final modeling to ensure adequacy
- **Feb** - Propose 2002/2005 Rate-of-Progress strategy
- **Mar** - Target NR Board meeting - NO<sub>x</sub> RACT rules
- **Apr/May** - Public Hearings for NO<sub>x</sub> RACT, NO<sub>x</sub> I/M, Conformity Budget, Progress Plans & Attainment Plan
- **Aug** - Target NR Board NO<sub>x</sub> RACT Rule Adoption
- **Dec** - Submit Full Phase 3 Ozone Attainment SIP



### ***SIP Planning Focus:***

- Reopening NOx Cutpoint Dialogue
- Looking at Options
- Assuming NOx I/M due to Waiver Removal & to get ROP Credits

### ***Issues:***

Cutpoints for NOx

What cutpoint Levels

Model Years affected

OBD-2 Interface

OBD-2 Substitution?

Need for cutpoints sensitive to ROP timing

**NOx I/M**

***Target for Proposal > March 2000***

*Target for Tier 2 Rule ~> Dec 1999 ?*

**Federal Off-Road Engine,  
On-Road Vehicle & Fuel Quality Standards**

***SIP Planning  
Assumptions:***

- Including all Current Standards and Agreements in Modeling
- Using adjusted MOBILE 5 Credits
- Crediting Phase 2 RFG & NLEV toward Progress
- Modeling most Strategies w/ Tier 2 and Low Sulfur
- Including consistent Off-Road Projections across Region

***Issues:***

Impact of Diesel Defeat Devices 1991/1996/2007

Understanding possible impact of MOB5>>>>MOB6

Defining need for Tier 2 Rules

Clarity of impact from expected future Model & Rule Changes



## 1996 VOC Progress

### Residual Obligations

- Non-CTG RACT (VOCs)



## 1999 VOC Progress

### Concerns

- Guidance Focus on NOx SIP
- Avoiding Litigation on Credits due to Waiver or Location
- Capturing Federal Mobile & Reasonable Upwind Credits

## 2002 NOx & VOC Progress

### Current Approach

- Claim Limited Regional Credits
- Assume Waiver Removed
- Pursue VOC & NOx Options
- ID Potential Early NOx Credits
- Federal Mobile Credits

## 2005/07 NOx & VOC Progress

*Target for Draft Plan ~> April/May 2000*

- Phase 2:** - 1998 Strategy 2 Derivative  
**(12/99)** - Should Include all recent Federal Rules  
- Short Lifetime - 1 Yr Max

***Target for Conformity Process Agreement ~> March 2000***

- Phase 3:** - should mirror final attainment demonstration  
**(12/00)** - likely to include Tier 2/Low Sulfur  
- include any mobile strategies in ROP  
- potential multi-year impact (3-5 yrs?)

**True-ups: MOB 6 &  
Mid-Course SIP  
Correction:**

**(12/03?)** - most impact  
on emission rates, but  
VMT change possible

- can be sensitive to  
updated Transportation  
modeling & base data  
improvements (census  
&/or surveys)



**Conformity  
Budgets**

*(as 1 Hr Ozone SIP revisions)*

# Conformity Budget Schedule

- √ **Oct/Nov** - Finalize VMT and Mobile Sector Emission inputs to regional modeling
- **Dec** - Evaluate AQ impacts of higher VMT growth assumptions using regional model platform
- **Dec/Jan** - Re-Submit Phase 2 Conformity Budget addressing EPA's "adequacy" concerns
- **Feb/Mar** - Formalize draft Phase 3 Attainment Plan for WI based on any regional agreement(s) and introduce related draft programs and rules
- **Apr/May** - Public Hearings - SIP, NOx Rules & Emission Budget proposals
- **June-Sept** - Refine Phase 3 Attainment SIP and related Conformity Budget proposal
- **Dec 2000** - Submit SIP w/ refined Conformity Budget

# Regional Agreement Schedule

- **Nov 99** - Craft working slate of legal/program options
- **Nov/Dec** - Establish final regional modeling platform and correct all emissions, meteorology, & model inputs
- **Dec/Jan** - Finish core regional attainment strategy modeling (*for 1-Hour needs but sensitive to 8-Hour Impacts*)
- **Jan/Feb** - Attempt Regional Agreement and do final modeling to ensure will meet affected area NOx reduction objectives (*consistent with downwind SIP needs*)
- **Mar** - Formalize draft attainment Plan(s) based on agreement(s)
- **Apr 00**- Notify states of likely petitions supported by the regional modeling & not yet addressed by MOA's

# Summary 1-Hour SIP Schedule

- ? **Nov 99** -EPA Action - Phase 2 SIPs (*Partial Approve?*)
- **Dec 99** - Finish initial regional 1-Hr attainment strategy modeling & submit final Phase 2 elements
- **Jan/Feb** - Attempt Regional Agreement and do final attainment modeling (*consistent with downwind SIP needs*)
- **Mar** - Formalize draft Plan(s) based on agreement(s) and set-up for Public Hearing w/ Budgets & Rules
- **Apr** - Notify EPA & states of expected 126 petitions
- **Apr/May** - Public Hearings for NOx Rules, Emission Budget & related Attainment SIP elements
- **Aug** - Target NR Board NOx RACT Rule Adoption
- **Sept-Oct** - Final SIP Package Legislative Review
- **Dec 00**- Submit Full Phase 3 Ozone Attainment SIP